

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re:	) Chapter 11
15375 MEMORIAL CORPORATION, <i>et al.</i> ,	)
Debtors.	) Bankr. Case. No. 06-10859 (KG)
	)
	) (Jointly Administered)
	)
BEPCO L.P., f/k/a	)
Bass Enterprises Production Company,	)
Appellant,	) Civil Action No. 08-313 (SLR)
	)
v.	) (Consolidation of civil actions 08-313,
15375 MEMORIAL CORPORATION, <i>et al.</i> ,	) 314, 318, 319, 321, 322, 325 and 326)
	)
Appellees and Cross-Appellants.	)

**JOINDER OF APPELLEES AND CROSS-APPELLANTS 15375 MEMORIAL CORPORATION AND SANTA FE MINERALS, INC. TO RESPONSE OF GLOBALSANTAFE ENTITIES IN OPPOSITION TO BEPCO, L.P. F/K/A BASS ENTERPRISES PRODUCTION COMPANY'S MOTION (I) FOR CONSIDERATION OF SUPPLEMENTAL MATERIALS IN CONNECTION WITH CERTIFICATION REQUEST AND (II) TO SUPPLEMENT RECORD ON APPEAL**

Debtors and Debtors in possession 15375 Memorial Corporation (“Memorial”) and Santa Fe Minerals, Inc. (“Santa Fe”)(collectively, “Debtors”), by their undersigned counsel, hereby joins the *RESPONSE OF GLOBALSANTAFE ENTITIES IN OPPOSITION TO BEPCO, L.P. F/K/A BASS ENTERPRISES PRODUCTION COMPANY’S MOTION (I) FOR CONSIDERATION OF SUPPLEMENTAL MATERIALS IN CONNECTION WITH CERTIFICATION REQUEST AND (II) TO SUPPLEMENT RECORD ON APPEAL* that was filed on June 19, 2008 (Docket No. 16).

WHEREFORE, Debtors respectfully request the entry of an Order denying the Motion to Supplement and request such other and further relief as this Court deems necessary and just.

Dated: June 23, 2008  
Wilmington, Delaware

Respectfully submitted,  
STEVENS & LEE, P.C.

/s/ John D. Demmy

John D. Demmy (Bar No. 2802)  
1105 North Market Street, 7th Floor  
Wilmington, DE 19801  
Telephone: (302) 425-3308  
Telecopier: (610) 371-8515  
Email: jdd@stevenslee.com

-and-

John C. Kilgannon  
1818 Market Street, 29th Floor  
Philadelphia, PA 19103  
Telephone: (215) 751-1943  
Facsimile: (610) 371-7954  
Email: jck@stevenslee.com

*Attorneys for the Debtors*